

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)
v.) Crim. No. 04-10345-NMG
MOHAMMED ABDUL RASHEED QURAISHI,)
MOHAMMED ABDUL QAYIUM QURAISHI,)
MOHAMMED ABDUL AZIZ QURAISHI,)
Defendants.)

**STATUS REPORT AND REQUEST FOR RELIEF AS TO MOHAMMED ABDUL
AZIZ QURAISHI AND MOHAMMED ABDUL QAYYUM QURAISHI**

Defendants Mohammed Abdul Aziz Quraishi (“Aziz”) and Mohammed Abdul Qayum Quraishi (“Farees”) (collectively, the “Brothers”) respectfully submit the following status report and request for relief. As set forth below, the Defendants have been provided with the opportunity to visit their mother before she dies, but the hours of such visits have been extremely limited. Defendants respectfully request that the Court allow them to see their mother beyond the hours of 11 a.m. and 3 p.m. during their four-day visit to Massachusetts.

1. The Brothers arrived in Massachusetts on Saturday, January 5, 2008 at approximately 12 p.m. *See* Declaration of Tyler Baxter, Docket No. 152. Upon their arrival in Massachusetts, they were transported to FMC Devens, where they are being housed during their visit to Massachusetts. *See* Affidavit of Laura B. Angelini, attached hereto as Exhibit A. They were not permitted to visit with their mother at all on Saturday. *Id.*

2. On Sunday, January 6, 2008, the Brothers were transported to Good Samaritan Hospital in Boston, Massachusetts at approximately 9:30 - 10:00 a.m., where they visited with their mother until approximately 3:00 p.m. Id. At 3:00 p.m., they were transported back to FMC Devens, where they remained for the duration of the afternoon and evening. Id.

3. On Monday, January 7, 2008, the Brothers did not arrive at Good Samaritan Hospital until 11:00 a.m. to begin their second day of visiting with their mother. Id. They have been informed that they need to be ready to leave by 2:45 p.m. Id. Thus, today, they will spend less than four (4) hours with their mother. Id.

4. The Government has informed counsel that the Defendants need to return to FMC Devens at 4 p.m. for inmate accountability reports, and because there is less staff at FMC Devens outside of the hours of 7:30 a.m. and 4 p.m.

5. As the parties are aware, Mrs. Sultana's medical condition is dire and she is expected to die any day. The Court granted the Brothers' request to visit their dying mother for the very purpose of allowing them to visit with their mother before she dies and to administer her last rites. Now that they are here, the Brothers simply desire to spend as much time as possible with her and make the most out of their final days together.

6. In light of the purpose of the Brothers' trip to Massachusetts, it is inequitable that they have been restricted to limited visits with their mother, and that the majority of their time has been spent at FMC Devens.

7. Accordingly, the Brothers respectfully request that they be permitted to visit with their mother beyond the hours of 11:00 a.m. to 2:45 p.m. each day, including visiting with her in the morning and into the evening.

8. Additionally, the Brothers respectfully request that they be informed by telephone, regardless of the hour of the day, if their mother's condition has worsened and, if her doctors believe her death is imminent, be permitted to see her immediately.

9. The Government has informed counsel for the Defendants that, if their mother dies during the evening, they will not be notified until the following morning.

Respectfully submitted,

COUNSEL FOR AZIZ QURAISHI,

/s/ Laura B. Angelini
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Dated: January 7, 2008

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of January, 2008, this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/ Laura B. Angelini

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MOHAMMED ABDUL AZIZ QURAISHI,)
Defendants.)
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AFFIDAVIT OF LAURA B. ANGELINI

I, Laura B. Angelini, hereby declare and state the following:

1. I am counsel for Mohammed Abdul Aziz Quraishi (“Aziz”). I submit this Affidavit on behalf of Aziz Quraishi and his brother, Mohammed Abdul Qayium Quraishi (“Farees”) (collectively, the “Brothers”), in support of their Status Report and Request for Relief.

2. On January 7, 2008, I spoke with Aziz Quraishi and his wife, who informed me of the following:

3. Upon their arrival to Massachusetts at approximately 12 p.m. on Saturday, January 5, 2008, the Brothers were transported to FMC Devens, where they are being housed during their visit to Massachusetts. They were not permitted to visit with their mother at all on Saturday.

4. On Sunday, January 6, 2008, the Brothers were transported to Good Samaritan Hospital in Boston, Massachusetts at approximately 9:30 - 10:00 a.m., where they visited with their mother until approximately 3:00 p.m. Id. At 3:00 p.m., they were

transported back to FMC Devens, where they remained for the duration of the afternoon and evening. Id.

5. On Monday, January 7, 2008, the Brothers did not arrive at Good Samaritan Hospital until 11:00 a.m. to begin their second day of visiting with their mother. Id. They have been informed that they need to be ready to leave by 2:45 p.m. Id. Thus, today, they will spend less than four (4) hours with their mother. Id.

SUBSCRIBED AND SWORN TO UNDER THE PENALTIES OF PERJURY
THIS 7th DAY OF JANUARY, 2008.

/s/ Laura B. Angelini